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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:	:	Chapter 11 Case No.
	:	
LEHMAN BROTHERS HOLDINGS INC.,	:	08-13555 (JMP)
<i>et al.</i> ,	:	
	:	(Jointly Administered)
Debtors.	:	
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**DECLARATION OF HAYDEN MCNAMARA RE RESPONSE OF
MILLENNIUM MARKETING & MANAGEMENT PTY, LTD. TO DEBTORS'
ONE HUNDRED TWENTIETH OMNIBUS OBJECTION TO CLAIMS
(NO BLOCKING NUMBER LPS CLAIMS)**

I, Hayden McNamara, under penalty of perjury, hereby declare as follows:

1. I am employed by Australia and New Zealand Banking Group Limited ("ANZ") as the Head of Service of Global Markets Operations. I am over the age of eighteen and not a party to this action.

2. In my capacity as Head of Global Service, I am a duly authorized custodian of records, or other qualified witness, for ANZ. As to the following facts, I know them to be true of my own knowledge or have gained knowledge of them from the business records of ANZ as they relate to Millennium Marketing & Management Pty Ltd. ("Millennium"), which were made at or about the time of the events recorded, and which are maintained in the ordinary course of ANZ's business at or near the time of the acts, conditions or events to which they relate. Any such document was prepared in the ordinary course of business of ANZ by a person who had personal knowledge of the event being recorded and had or has a business duty to accurately record such events. The business records as they relate to Millennium are available for inspection and copies can be submitted to the Court if required.

3. ANZ currently holds one security on behalf of Millennium. This security has ISIN XS0305158031 and has a face value of \$200,000 AUD (the "Relevant Security").

4. At all times between November 6, 2008 and the date of this declaration, Millennium is and has been the beneficial owner of the Relevant Security.

5. Due to an internal error on the part of ANZ in September 2009, important correspondence relating to obtaining a blocking reference number with respect to the Relevant Security, including the Securities Programs Bar Date Notice, was not sent by ANZ to Millennium.

6. As such, ANZ did not obtain a blocking reference number for the Relevant Security prior to the October 2009 deadline.

7. On May 6, 2011, I sent a letter, attached hereto as Exhibit A, to Millennium acknowledging that the correspondence relating to the blocking number requirements was erroneously sent to a facsimile unrelated to Millennium.

8. On May 10, 2011, I sent an e-mail transmission to Denis Aitken acknowledging that Millennium was currently, and has at all relevant times since November 6, 2008 been, the beneficiary of the Relevant Security. A true and correct copy of the e-mail message is attached hereto as Exhibit B.

Executed on this 18th day of May, 2011, in Stoney, Australia.

/s/ *Hayden McNamara*

Hayden McNamara
Head of Service, ANZ